

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

LKQ CORPORATION, and KEYSTONE
AUTOMOTIVE INDUSTRIES, INC.,

Plaintiffs,

v.

KIA AMERICA, INC. and KIA
CORPORATION,

Defendants.

Civil Action No. 1:21-cv-03166

Jury Trial Demanded

KIA’S CERTIFICATION UNDER RULE 11

Pursuant to the Court’s January 12, 2023 Order (Dkt. 153), Defendants Kia Corporation and Kia America, Inc. (collectively, “Kia”) hereby certify under Rule 11 of the Federal Rules of Civil Procedure that Kia has conducted a reasonable inquiry as to whether the eight inventors—*i.e.*, (1) Jae Do Han; (2) Seo Hee Ahn; (3) Hyung Uk Chang; (4) Jae Kun Lee; (5) Chi-Young Kim; (6) Byung-Woo Kim; (7) Woo Hyun Kim; and (8) Hwan Wook Baek—have any additional responsive documents in their possession, custody, and control. Kia has produced all responsive documents in their possession, custody, or control.

Dated: January 31, 2023

/s/ K. Kevin Mun

Edward J. Naidich

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Attorneys for Defendants

Kia America, Inc. and

Kia Corporation

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served via ECF on January 31, 2023
upon all counsel of record.

/s/ K. Kevin Mun
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